

1 **LAW OFFICES OF SHELBY NICOLE ALBERTS**

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8 Attorneys for Defendant
9 **JASON LIPP**

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11 **IN THE UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 JASON LIPP,

17 Defendant.

18 CASE NO. 2:25-MJ-00076-JDP-1

19 STIPULATION AND [PROPOSED] ORDER TO
20 CONTINUE BENCH TRIAL

21 DATE: September 2, 2025

22 TIME: 10:00 a.m.

23 COURT: Magistrate Judge Jeremy Peterson

24 **STIPULATION**

25 Defendant, Jason Lipp, by and through his counsel of record, and plaintiff, by and through its
26 counsel of record, hereby stipulate as follows:

27 1. By previous order, this matter was set for a Bench Trial on September 2, 2025. An order
28 was signed on July 16, 2025, approving a substitution of counsel, deeming Ms. Alberts the attorney of
record for Mr. Lipp.

29 2. Ms. Alberts is assigned to Department 18, in front of the Honorable Carlton Davis, for a
30 jury trial in People v. Deandre Davis, #19FE010790. There are four defendants charged in this case,
31 each of them are facing murder and attempted murder charges. Ms. Alberts is currently under court
32 order not to get assigned out on any other trials or complex hearings until August 25, 2025, when the
33 status of the jury trial can be determined.

34 3. The government sent an offer to resolve the instant case on July 31, 2025. The parties

1 need additional time to explore the possibility of resolving the instant case.

2 4. Discovery is still ongoing, and in light of Ms. Alberts substituting in as counsel in recent
3 weeks, the parties are in the process of confirming that counsel for Mr. Lipp has all the discovery.

4 5. Based on the items above, counsel for Mr. Lipp is seeking a continuance of the Bench
5 Trial set on September 2, 2025. The United States does not object to this requested continuance.

6 6. By this stipulation, the parties now move to continue the contested hearing until October
7 28, 2025 at 10:00 a.m.

8 7. The parties understand that this date is available to the Court for a Bench Trial.

9 8. It is therefore requested that the contested hearing date currently scheduled for September
10 2, 2025 be continued to October 28, 2025 at 10:00 a.m. before this Court.

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13 IT IS SO STIPULATED.

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15 Dated: August 15, 2025

ERIC GRANT
United States Attorney

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17 /s/ *NCHEKUBE ONYIMA*
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NCHEKUBE ONYIMA
19 Special Assistant United States
20 Attorney

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22 Dated: August 15, 2025

/s/ SHELBY NICOLE ALBERTS
23 SHELBY NICOLE ALBERTS
24 Counsel for Defendant
25 Jason Lipp

1 [PROPOSED] ORDER
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4 IT IS SO FOUND AND ORDERED this 22nd day of August, 2025.
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8 JEREMY D. PETERSON
9 UNITED STATES MAGISTRATE JUDGE
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